

Attachment 2

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 4:22-md-03047-YGR

MDL No. 3047

**PLAINTIFFS' THIRD SET OF REQUESTS
FOR ADMISSION TO THE META
DEFENDANTS**

PROPOUNDING PARTY: MDL Personal Injury, Local Government, and State Attorney General Plaintiffs

RESPONDING PARTIES: Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC, Facebook Payments, Inc., Siculus, Inc., and Facebook Operations, LLC

SET: 3

DATE OF SERVICE: February 21, 2025

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Plaintiffs, through the undersigned counsel, propound the following Requests for Admission on Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC, Facebook Payments, Inc., Siculus, Inc., and Facebook Operations, LLC (collectively “Meta” or “Meta Defendants”). Responses to these Requests for Admission, or objections in lieu thereof, shall be served within 30 days after service of this document and in accordance with the definitions and instructions below.

I. **DEFINITIONS**

1. **“Child” or “Children”** means individual(s) under the age of thirteen (13).
2. **“collect,” “collects,” and “collection”** have the meaning provided in 16 C.F.R. § 312.2.
3. **“Facebook Platform” or “Facebook”** means any version of the Facebook platform made available for use, including versions for use on mobile devices or by accessing a URL on the internet, with or without logging into an account, and including all features or surfaces accessible to some or all users of the platform.
4. **“Instagram Platform” or “Instagram”** means any version of the Instagram platform made available for use, including versions for use on mobile devices or by accessing a URL on the internet, with or without logging into an account, and including all features or surfaces accessible to some or all users of the platform.
5. **“Personal information”** has the same meaning as the term is defined in 16 CFR § 312.2.
6. **“Teen” or “Teens”** means individuals between the ages of thirteen (13) and seventeen (17), inclusively.
7. **“User”** means a user of Facebook or Instagram, whether the individual has an account on either platform or not.
8. **“User Control”** means any feature of the Instagram Platform that allows users to tailor their profile or experience to their own unique preferences including, but not limited to,

1 private account, content control settings, DM reachability settings, time management settings,
 2 notification restrictions, and interaction settings.

3 9. **“Verifiable parental consent”** has the meaning given to it by 16 C.F.R. § 312.2
 4 (“Obtaining verifiable consent”).

5 10. **“You,” “Your,” “Defendant,” or “Defendants”** means the above-named
 6 Responding Party or Parties (individually and, where applicable, collectively); each of their
 7 predecessor or successor business entities; each foreign or domestic nongovernmental or private
 8 corporation or entity with which they are commonly owned, including subsidiaries and parent
 9 corporations; each of their former or present Units; and for each of the foregoing all former or
 10 present directors, officers, members, partners, principals, employees, contractors, agents,
 11 attorneys, experts, investigators, consultants, or other persons authorized to act on their behalf.

12 11. **“Your Platforms”** and **“Meta’s Platforms”** means the Facebook and Instagram
 13 Platforms.

14 12. **“Youth”** means individuals under the age of twenty-two (22).

16 II. RULES OF CONSTRUCTION

17 1. The use of the conjunctive includes the use of the disjunctive and the use of the
 18 disjunctive includes the use of the conjunctive.

19 2. The use of the singular form of any word includes the plural, and vice versa; and
 20 the use of the masculine gender shall include the feminine and the neutral genders, and vice versa.

21 3. The use of any tense of any verb shall also include within its meaning all other
 22 tenses of the verb.

23 4. A term or word defined herein is meant to include both the lower and upper case
 24 reference to such term or word.

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1 **III. INSTRUCTIONS**

2 1. Each matter contained herein shall be deemed admitted unless Plaintiffs receive a
3 written answer or objection to each Request, signed by counsel, within thirty (30) days after service
4 of these Requests.

5 2. If You deny, or refuse to admit, any Request, in whole or in part, You must “state
6 in detail why [You] cannot truthfully admit or deny” the Request, in accordance with Rule 36(a)(4)
7 of the Federal Rules of Civil Procedure.

8 3. You may not give lack of information or knowledge as a reason for Your failure to
9 admit or deny a request unless You state that You have made reasonable inquiry and that the
10 information known or readily obtainable by You is insufficient to enable You to admit or deny the
11 admission requested. Fed. R. Civ. P. 36(a)(4).

12 4. You may not object to a Request on grounds that the matter for which an admission
13 is requested presents a genuine issue for trial.

14 5. Unless otherwise indicated, the relevant time period for the information sought is
15 2012 to the present (“Relevant Time Period”).

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1 **IV. REQUESTS FOR ADMISSION**

3 **REQUEST NO. 18.**

4 Admit that You do not provide notice (as described in 16 CFR § 312.4) of what
5 information You collect from Children on Facebook or Instagram, how You use such
6 information, or Your disclosure practices for such information.

7 **RESPONSE:**

9 **REQUEST NO. 19.**

10 Admit that You do not obtain Verifiable parental consent to collect, use, and/or disclose
11 personal information that You collect from Children who visit Facebook with or without
12 logging into an account.

13 **RESPONSE:**

15 **REQUEST NO. 20.**

16 Admit that You do not provide a means for a parent to review the personal information
17 collected from their Children who visit Facebook with or without logging into an account, in a
18 manner described in 16 CFR § 312.6(a)(3).

19 **RESPONSE:**

21 **REQUEST NO. 21.**

22 Admit that You do not provide a means for a parent to refuse to permit the further use or
23 maintenance of the information collected from their Child on Your Platforms, in the manner
24 described in 16 CFR § 312.6(a)(2).

25 **RESPONSE:**

27 **REQUEST NO. 22.**

28 Admit that, during the period from October 2020 until December 2021, when You

1 determined a User was likely a Child and disabled their Facebook or Instagram account, You
2 did not immediately disable any other Facebook or Instagram account the User had linked in the
3 Accounts Center feature.

4 **RESPONSE:**

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6 **REQUEST NO. 23.**

7 Admit that, from at least April 2016 through September 2020, when You determined a
8 User was likely a Child and disabled their Facebook or Instagram account, You did not
9 immediately disable any other Facebook or Instagram account the User had linked in the Linked
10 Accounts feature.

11 **RESPONSE:**

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13 **REQUEST NO. 24.**

14 Admit that Exhibit A, Meta's Form 10-K for year 2024, accurately reports Meta's
15 financial results as reported to the Securities & Exchange Commission.

16 **RESPONSE:**

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18 **REQUEST NO. 25.**

19 Admit that for fiscal year 2024, Meta reported \$164,501,000,000.00 in gross revenue to
20 the Securities & Exchange Commission.

21 **RESPONSE:**

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23 **REQUEST NO. 26.**

24 Admit that for fiscal year 2024, Meta reported \$69,380,000,000.00 in net revenues to the
25 Securities & Exchange Commission.

26 **RESPONSE:**

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1 **REQUEST NO. 27.**

2 Admit that for fiscal year 2024, Meta reported \$5,070,000,000.00 in dividends to the
3 Securities & Exchange Commission.

4 **RESPONSE:**

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6 **REQUEST NO. 28.**

7 Admit that for fiscal year 2024, Meta reported \$52,103,000,000.00 in free cash flow to
8 the Securities & Exchange Commission.

9 **RESPONSE:**

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11 **REQUEST NO. 29.**

12 Admit that for fiscal year 2024, Meta reported \$62,360,000,000.00 in profits to the
13 Securities & Exchange Commission.

14 **RESPONSE:**

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16 **REQUEST NO. 30.**

17 Admit that prior to the launch of Teen Accounts in September 2024, Instagram Platform
18 did not default all Users under 16 years old into the platform's strictest User Control settings.

19 **RESPONSE:**

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21 **REQUEST NO. 31.**

22 Admit that You never disclosed to the public any statistics or results from the Bad
23 Experiences & Encounters Framework (BEEF) surveys.

24 **RESPONSE:**

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26 **REQUEST NO. 32.**

27 Admit that You never disclosed to the public any statistics or results from the Tracking
28 Reach of Integrity Problems Survey (TRIPS).

1 **RESPONSE:**

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3 **REQUEST NO. 33.**

4 Admit that Meta tracked "time spent" as a guardrail metric during certain time periods.

5 **RESPONSE:**

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7 **REQUEST NO. 34.**

8 Admit that increasing User "time spent" on Meta's Platforms is or was an articulated goal
9 at Meta at least once during the Relevant Time Period.

10 **RESPONSE:**

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12 **REQUEST NO. 35.**

13 Admit that You never disclosed to the public that increasing User "time spent" on Meta's
14 Platforms is or was an articulated goal at Meta.

15 **RESPONSE:**

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17 **REQUEST NO. 36.**

18 Admit that the statements attributed to Eva Chen in the following article were made when
19 Eva Chen was authorized to speak on Meta's behalf: Sangeeta Singh-Kurtz, *Instagram is*
20 *building a team to stop people from feeling bad on Instagram*, Quartz (April 3, 2018),
21 <http://archive.today/Wvh7k>.

22 **RESPONSE:**

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24 **REQUEST NO. 37.**

25 Admit that the statement attributed to Facebook in the following article was made by a
26 Meta employee authorized to speak on Meta's behalf: Hilary Andersson, *Social Media Apps Are*
27 *Deliberately "Addictive" to Users*, BBC (July 4, 2018), <https://archive.ph/Hxrp8>.

28 **RESPONSE:**

1 REQUEST NO. 38.

2 Admit that the statements attributed to Instagram and Facebook in the following article
 3 were made by Meta employees authorized to speak on Meta's behalf: *Mental Health: UK could*
 4 *ban social media over suicide images, minister warns*, BBC (Jan. 27, 2019),
 5 <https://www.bbc.com/news/uk-47019912>.

6 RESPONSE:**8 REQUEST NO. 39.**

9 Admit that the statements attributed to a Facebook spokesperson in the following article
 10 were made by a Meta employee authorized to speak on Meta's behalf: Lauren Feiner, *More*
 11 *than 40 attorneys general ask Facebook to abandon plans to build Instagram for kids*, CNBC
 12 (May 10, 2021), <https://www.cnbc.com/2021/05/10/attorneys-general-ask-facebook-to-abandon-instagram-for-kids-plans.html>.

14 RESPONSE:**16 REQUEST NO. 40.**

17 Admit that the statements attributed to Elizabeth Lagone, Meta, and "a Meta executive"
 18 in the following article were made by Meta employees authorized to speak on Meta's behalf:
 19 Adam Satariano, *British Ruling Pins Blame on Social Media for Teenager's Suicide*, N.Y.
 20 Times (Oct. 1, 2022), <https://www.nytimes.com/2022/10/01/business/instagram-suicide-ruling-britain.html>.

22 RESPONSE:**24 REQUEST NO. 41.**

25 Admit that Meta has never implemented a feature that automatically or by default limits
 26 time spent on Meta's Platforms for adolescent Users.

27 RESPONSE:

1 **REQUEST NO. 42.**

2 Admit that Meta has never implemented a feature that automatically or by default limits use
3 of Meta's Platforms to non-school hours for adolescent Users.

4 **RESPONSE:**

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6 **REQUEST NO. 43.**

7 Admit that Meta has never implemented a feature that automatically or by default limits
8 Meta's Platforms' use in a manner that would prevent disrupting adolescent sleeping hours.

9 **RESPONSE:**

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11 **REQUEST NO. 44.**

12 Admit that Meta never warned adolescent Users or their guardians about the potential risks
13 to adolescent well-being and mental health associated with use of Meta's Platforms.

14 **RESPONSE:**

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16 **REQUEST NO. 45.**

17 Admit that Meta generates substantially all of its revenue from selling advertising
18 placements on its family of apps to marketers.

19 **RESPONSE:**

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21 **REQUEST NO. 46.**

22 Admit that Meta uses the personal information it gathers about Users, regardless of age, to
23 better target its advertising services.

24 **RESPONSE:**

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26 **REQUEST NO. 47.**

27 Admit that Meta associates information collected about individuals who visit Facebook
28 or Instagram pages without logging in (including information about how they interact with

1 Facebook or Instagram) with one or more identifiers described in the definition of “personal
2 information” in 16 CFR § 312.2.

3 **RESPONSE:**

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5 **REQUEST NO. 48.**

6 Admit that the personal information You collect from individuals who visit Facebook or
7 Instagram pages without logging in is used for targeting advertisements to those individuals.

8 **RESPONSE:**

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on February 21, 2025 to Counsel for Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC, Facebook Payments, Inc., Siculus, Inc., and Facebook Operations, LLC:

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